

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Mohamed Elsherif,)	
)	
Plaintiff,)	Civil No.0:18-cv-02998-DWF-KMM
)	
v.)	DECLARATION OF
)	VYTAS RIMAS
Mayo Clinic and Robert J. Spinner,)	
)	
Defendants.)	
)	

I, Vytas Rimas, make the following Declaration in the above-captioned matter.

1. I am the attorney of record for Plaintiff Dr. Mohamed Elsherif.
2. I make this Declaration based on my personal knowledge of the matters stated herein.
3. This Declaration is submitted in support of Plaintiff's Amended Motions to Compel Rule 30(b)(6) Deposition and to Take Defendants' Depositions Out of Time.
4. Attached hereto are true and correct copies of the following Exhibits:
 - Exhibit 1: Plaintiff's Notice of Deposition of Dr. Robert J. Spinner.
 - Exhibit 2: Plaintiff's Notice of Deposition of Lyn Pletta.
 - Exhibit 3: Plaintiff's Notice of Rule 30(b)(6) Topics.
 - Exhibit 4: Mayo's Objections to Rule 30(b)(6) Topics.
 - Exhibit 5: Emails with Attorney Sarantopoulos regarding Mayo's adjusted deposition schedule for Mayo's witnesses.

Exhibit 6: Meet and confer emails with Attorney Wood regarding postponed
Plaintiff's depositions of Defendants.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER THE PENALTY OF
PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THIS
DECLARATION WAS EXECUTED ON MARCH 23, 2020.

By: s/ Vytas Rimas
Vytas Rimas